



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza*

October 18, 2013

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 660
New York, New York 10007

**Re: United States v. Lebanese Canadian Bank SAL, et al.,
11 Civ. 9186 (PAE)**

Dear Judge Engelmayer:

The Government respectfully submits for the Court's approval two proposed orders disposing of all remaining claims and parties in this action. First, the Government respectfully requests that the Court so order a Stipulation and Order, attached as Exhibit A, between the Government and the various insurance company and judgment creditor claimants in this matter, under which those parties' claims are withdrawn and are to be dismissed with prejudice. Second, the Government respectfully requests that the Court enter a Notice of Voluntary Dismissal, attached as Exhibit B, dismissing the Government's claims for civil money laundering penalties against defendants STE Nomeco SARL, STE Marco SARL, and the Salhab Travel Agency (the "Remaining Defendants"), and for forfeiture of all assets of the Remaining Defendants.

With respect to the latter order, on May 4, 2012, the Government filed a Motion respectfully requesting *inter alia*, that the Court issue Letters Rogatory to the appropriate judicial authorities of the Republic of Togo for the service of the Summons and Complaint in the above referenced matter upon defendants Salhab Travel Agency and STE Marco SAL, and to the appropriate judicial authorities of the Republic of Benin for such service upon defendant STE Nomeco SAL. On June 1, 2012, this Court granted the Government's motion and issued the requested Letters Rogatory to the Republics of Togo and Benin. On or about June 21, 2013 a Return of Unexecuted Letters Rogatory was filed as to Salhab Travel Agency and STE Marco S.A.R.L. from Lomo, Togo indicating that service was unable to be completed. To date, the Republic of Benin has not responded to the Letters Rogatory. Because the Government has been

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unable to effectuate service upon the Remaining Defendants, the Government respectfully requests that the Court dismiss the money laundering claims against the Remaining Defendants.

Additionally, the Government has been unable to identify any assets of the Remaining Defendants that are currently available for forfeiture. Therefore, the Government also respectfully requests that the Court further dismiss the forfeiture claims against all assets of the Remaining Defendants.

Entry of the proposed Stipulation and Order and Notice of Voluntary Dismissal will dispose of all remaining claims in this action.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/ Alexander Wilson
Sharon Cohen Levin/Michael D. Lockard/
Jason H. Cowley/Alexander Wilson
Assistant United States Attorneys
(212) 637-1060/2193/2479/2453

cc: Sean Carter (SCarter1@cozen.com)
Counsel for the Insurance Company Claimants

Liviu Vogel (LVogel@salonmarrow.com)
Counsel for the Judgment Creditor Claimants